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January 19, 2017

Via ECF

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Joint Conference scheduled for February 8, 2017

Dear Judge Daniels and Magistrate Judge Netburn:

Defendants, the Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia & Herzegovina (“SHC”) along with the defendants currently engaged in merits or personal jurisdiction discovery, and the Plaintiffs’ Executive Committees on behalf of all plaintiffs, jointly write in response to Judge Netburn’s request that the parties file a joint letter by January 20, 2017, addressing whether the February 8, 2017 Joint Conference before Judges Daniels and Netburn should proceed and, if so, what the parties seek to address at that time.

All parties agree that the proposed conference is unnecessary. A number of new complaints have been filed against the Kingdom and the SHC and consolidated before this Court. The only agenda item for the Kingdom of Saudi Arabia and the SHC would have been to discuss a briefing schedule for their motions to dismiss or oppositions to motions for leave to amend once they are served with a consolidated amended complaint. Until that consolidated amended complaint is served, however, it will be difficult to determine an appropriate briefing schedule. The parties instead would ask the Court to direct the parties to meet and confer once the consolidated amended complaint is served and propose a briefing schedule on an opposition to leave to amend and/or motion to dismiss. The proposed schedule would cover the newly filed

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complaints as well as the earlier cases that are still pending before the Second Circuit, and the time for any responses to the newly filed complaints would be extended until such a schedule is set.

The parties have no issues to address at this time regarding the defendants currently engaged in merits or personal jurisdiction discovery.

Judge Netburn has indicated that she wishes to address certain issues relating to the Iran default proceedings. Plaintiffs are available to address those issues on February 8th if the Court wants to proceed with a conference limited to those topics, or to address them at a later date if that would be more convenient for the Court.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

Cc: Chambers of the Honorable George B. Daniels (via Federal Express)
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